



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

December 30, 2002

Certified Mail No. 7000 1670 0013 9128 9011

Beth Elroy
Senior Environmental Engineer
P₄ Production, LLC
P.O. Box 816
Soda Springs, ID 83276

RE: AIRS Facility No. 029-00001, P₄ Production, LLC, Soda Springs
Final Tier I Operating Permit

Dear Ms. Elroy:

The Department of Environmental Quality (Department) is issuing Tier I Operating Permit No. 029-00001 to P₄ Production, LLC in Soda Springs, in accordance with IDAPA 58.01.01.300 - 386. The enclosed permit is effective immediately and is based on the information contained in your permit application, received August 8, 1995.

Rick Elkins of the Pocatello Regional Office will contact you regarding a meeting to discuss the permit terms and requirements. The Department recommends the following representatives attend this meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of the decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Bill Rogers at (208) 373-0502 or wrogers@deq.state.id.us to discuss any questions or concerns you may have with the enclosed permit.

Sincerely,

Katherine B. Kelly
Administrator
Air Quality Division

KK/cpr Project No. T1-9508-127-1 G:\AIR QUALITY\STATIONARY SOURCE\SS LTD\T1\P4\FINAL\T1-9508-127-1 FINAL PL.DOC

Enclosures

cc: Sherry Davis, Air Quality Division
Rick Elkins, Pocatello Regional Office
Laurie Kral, EPA Region 10



**Air Quality
TIER I OPERATING PERMIT**

**State of Idaho
Department of Environmental Quality**

PERMIT NO.: 029-00001

AQCR: 61

CLASS: A

SIC: 2819

ZONE: 12

UTM COORDINATE (km): 452.0 , 4726.0

1. PERMITTEE
P₄ Production, LLC

2. PROJECT
Tier I Operating Permit

3. MAILING ADDRESS
P.O. Box 816

CITY
Soda Springs

STATE
ID

ZIP
83276

4. FACILITY CONTACT
Beth Elroy

TITLE
Senior Environmental
Engineer

TELEPHONE
(208) 547-4300 ext. 418

5. RESPONSIBLE OFFICIAL
Bruce Pallante

TITLE
Plant Manager

TELEPHONE
(208) 547-4300 ext. 201

6. EXACT PLANT LOCATION
2 miles north of Soda Springs, Idaho, on Highway 34

COUNTY
Caribou

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Elemental phosphorus production

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.300 - 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by the Department on the cover page.


KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: December 30, 2002

DATE December 30, 2006

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AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001**Permittee:** P₄ Production, LLC
Location: Soda Springs, Idaho**Project No.:** T1-9508-127-1**Date Issued:** December 30, 2002
Date Expires: December 30, 2006*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***1. FACILITY-WIDE CONDITIONS**

The following requirements apply generally to emissions units at the facility.

Table 1.1 FACILITY-WIDE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
1.1	Fugitive emissions	Reasonable precautions	IDAPA 58.01.01.650-651	1.2, 1.3, 1.4, 1.11
1.5	Odorous gases, liquids, or solids	No emissions that cause air pollution	IDAPA 58.01.01.775-776	1.6, 1.11
1.7	Visible emissions	20% opacity for no more three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11
1.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130	1.9-1.9.5, 1.11
1.12	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	1.11
1.13	Asbestos	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	1.11
1.14	Accidental release prevention	Compliance with 40 CFR 68.215(a)(2)	40 CFR 68.10(a)	1.11
1.15	Air quality standards	EPA reference test methods	IDAPA 58.01.01.157	1.11, 1.16
1.16	Criteria air pollutants, opacity	Compliance testing	IDAPA 58.01.01.157	1.11, 1.15
1.17	Fuel oil sulfur content	ASTM grade 1 - 0.3 % by weight ASTM grade 2 - 0.5 % by weight	IDAPA 58.01.01.728	1.11, 1.18
1.19	Recycling and emissions reduction	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	1.11

Fugitive Emissions

- 1.1 In accordance with IDAPA 58.01.01.650-651, all reasonable precautions shall be taken to prevent PM from becoming airborne.
[IDAPA 58.01.01.650-651, 5/1/94]
- 1.2 The permittee shall monitor and maintain records of the method(s) used (e.g., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions and their frequency of use.
[IDAPA 58.01.01.322.06, 07, 5/1/94]

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- 1.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 1.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each monthly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions are present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only) 5/1/94; IDAPA 58.01.01.322.08 (state-only), 4/5/00]

Odors

- 1.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94]

- 1.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

Visible Emissions

- 1.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625, with the exception of Emission Unit 10, which is subject to IDAPA 58.01.01.625.02. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 5/1/94]

- 1.8 In addition to the requirements in Permit Conditions 22.3, 23.3, the permittee shall conduct a weekly facility-wide inspection of potential sources of visible emissions listed in Appendix A during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each weekly visible emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible

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Date Expires: December 30, 2006

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emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only) 5/1/94; IDAPA 58.01.01.322.08 (state-only), 4/5/00]

Excess Emissions

1.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 1.9 and the regulations of IDAPA 58.01.01.130-136.

1.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable actions to correct the conditions causing such excess emissions event, to reduce the frequency of occurrence of such events, and to minimize the amount by which the emission standard is exceeded. In addition, as provided below or upon request of the Department, this person shall submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

1.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emissions unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to:

[IDAPA 58.01.01.133, 4/5/00]

1.9.2.1 A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory and/or a Wood Stove Curtailment Advisory has been declared by the Department; and

[IDAPA 58.01.01.133.01.a, 3/20/97]

1.9.2.2 Notifying the Department of the excess emissions event as soon as reasonably possible, but no later than two hours prior to the start of the excess emission event, unless the owner or operator demonstrates to the Department's satisfaction that a shorter advanced notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

1.9.3.3 The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

1.9.3 In all cases where upset or breakdown of equipment or an emissions unit or the initiation of safety measures results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

1.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures that cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

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Date Expires: December 30, 2006

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- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

- The owner or operator shall notify the Department of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to the Department's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

- The owner or operator shall report and record the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

- 1.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, the Department may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the excess emissions until such time as the condition causing the excess emissions has been corrected or brought under control. Such action by the Department shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

- 1.9.4 A written report for each excess emissions event shall be submitted to the Department by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01, 3/20/97; IDAPA 58.01.01.135.02, 4/5/00]

- 1.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to the Department upon request. The excess emissions records shall include the information requested in IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97, IDAPA 58.01.01.136.03, 4/5/00]

- An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to the Department pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment.

[IDAPA 58.01.01.136.03.a, 4/5/00]

- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, and preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

**[IDAPA 58.01.01.136.03.b, 3/20/97; IDAPA 58.01.01.130-136, 4/5/00
(state-only; federally enforceable upon approval into the SIP); IDAPA 58.01.01.322.08.b, 3/23/98]**

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Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Reports and Certifications

- 1.10 All periodic reports and certifications required by this permit shall be submitted to the Department within 60 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Pocatello Regional Office
444 Hospital Way, Suite 300
Pocatello, ID 83201
Phone: (208) 236-6160 Fax: (208) 236-6168

The periodic compliance certification required by Permit Condition 27.21 shall also be submitted within 60 days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 5/1/94; IDAPA 58.01.01.322.11, 4/5/00]

Monitoring and Recordkeeping

- 1.11 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Monitoring records shall include, but not be limited to, the following information: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and supporting information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

Open Burning

- 1.12 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-616, 5/1/94]

Renovation/Demolition

- 1.13 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

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Regulated Substances for Accidental Release Prevention

- 1.14 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:
- 1.14.1 Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- 1.14.2 The date on which a regulated substance is first present above a threshold quantity in a process. [40 CFR 68.10 (a)]

Test Methods

- 1.15 If testing is required, the permittee shall use the test methods listed in Table 1.2 to measure the pollutant emissions.

Table 1.2 EPA REFERENCE TEST METHODS

Pollutant	Test Method*	Special Conditions
PM ₁₀	EPA Method 201.a EPA Method 202	
PM	EPA Method 5	
NO _x	EPA Method 7	
SO ₂	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Opacity	EPA Method 9	If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

* Or a Department-approved alternative in accordance with IDAPA 58.01.01.157

Compliance Testing

- 1.16 If testing is required, the permittee shall provide a notice of intent to test to the Department at least 15 days prior to the scheduled test. A shorter time period may be allowed if provided in a permit, order, or consent decree or by Department approval. The Department may, at its option, have an observer present at any emissions tests conducted on a source. The Department requests that such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior Department approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by the Department for any testing deviations, the Department may

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determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is encouraged to submit in writing to the Department, at least 30 days in advance, the following for approval:

- The type of test method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

Within 30 days following the date on which a compliance test required by this permit is concluded, the permittee shall submit to the Department a compliance test report for the respective test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to:

Air Quality Permit Compliance
Department of Environmental Quality
Pocatello Regional Office
444 Hospital Way, Suite 300
Pocatello, ID 83201
Phone: (208) 236-6160 Fax: (208) 236-6168

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Fuel Oil Sulfur Content

1.17 No person shall sell, distribute, use, or make available for use, any distillate fuel oil containing more than the following percentages of sulfur:

1.17.1 ASTM Grade 1 fuel oil - 0.3% by weight.

1.17.2 ASTM Grade 2 fuel oil - 0.5% by weight.

[IDAPA 58.01.01.728, 5/1/94]

1.18 The permittee shall maintain documentation of supplier verification of distillate fuel oil sulfur content on an as-received basis.

[IDAPA 58.01.01.322.01, 3/19/99]

Recycling and Emissions Reductions

1.19 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

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Ambient Air Quality Monitoring Requirements

- 1.20 Within 12 months after the Tier I operating permit is issued, the permittee shall install, maintain, and operate two reference sulfur dioxide ambient air quality monitors in accordance with the following:
- 1.20.1 The permittee shall submit an ambient monitoring protocol to the Department for approval within 120 days after the Tier I operating permit is issued. The protocol shall provide the specifications on the monitoring equipment and define the operating parameters for conducting the monitoring. The protocol when approved shall become part of the terms and conditions of the Tier 1 operating permit.
- 1.20.2 The monitoring sites shall be selected through modeling analysis. The permittee shall submit a modeling analysis protocol to the Department for approval within 60 days after the Tier I operating permit is issued. The permittee shall conduct and submit the modeling analysis for placing the monitors, with all backup data requested by the Department, for approval within 60 days after the modeling protocol is approved.
- 1.20.3 All monitoring data shall be submitted to the Department in accordance with the ambient monitoring protocol approved by the Department. The data shall be subject to Department quality assurance review. The Department may make all valid ambient air quality data available to the public.

[IDAPA 58.01.01.322.06, 14, 5/1/94; IDAPA 58.01.01.205.01.b, 5/1/94]

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2. EMISSIONS POINT 1 - Phosphate Ore Nodulizing Kiln and Cooler

Summary Description

The following requirements apply generally to emissions from the nodulizing kiln that is controlled by a dust knockout chamber, nodulizing kiln spray tower, four parallel cyclonic separators, and four parallel Hydro-Sonic® scrubbers. A spray tower controls the nodule cooler.

Table 2.1 describes the devices used to control emissions from Emissions Point 1 sources.

Table 2.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
302.10	Hydro treatment clarifier roof	Cyclonic separators and Hydro-Sonic® scrubbers
310.00	Kiln carbon monoxide, coal, and gas combustion,	Dust knockout chamber, nodulizing kiln spray tower, four parallel cyclonic separators and four parallel Hydro-Sonic® scrubbers
310.10	Treater oil combustion,	
310.20	Used motor oil combustion	
314.10	Nodule cooler	Spray tower

Table 2.2 contains a summary of the requirements that apply to the phosphate ore nodulizing kiln and cooler. Specific permit requirements are listed below Table 2.2.

Table 2.2 PHOSPHATE ORE NODULIZING KILN AND COOLER APPLICABLE REQUIREMENTS SUMMARY

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
2.1 ^a	Polonium-210	2 curies/year from kiln or install Hydro-Sonic® Tandem Nozzle Fixed Throat Free-Jet Scrubber System and limit total emissions from plant to 4.5 curies/year	40 CFR 61.122	2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 2.9, 2.10
2.11	Particulate matter	Process weight	IDAPA 58.01.01.702, 4/5/00	2.5, 2.15, 2.17
2.12	Coal - sulfur content	1% by weight	IDAPA 58.01.01.729, 5/1/94	2.16
2.13	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, 4/5/00	1.8

^a Permit Conditions 2.1 through 2.27.2 apply only to emissions from the kiln hydrosonics.

Emissions Standard

- 2.1 Emissions of polonium-210 to the ambient air from all calciners and nodulizing kilns at an elemental phosphorus plant shall not exceed a total of 2 curies per year; except that compliance with this standard may be conclusively shown if the elemental phosphorous plant does the following:
 - 2.1.1 Installs a Hydro-Sonic® Tandem Nozzle Fixed Throat Free-Jet Scrubber System including four scrubber units.

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- 2.1.2 All four scrubber units are operated continuously with a minimum average over any six-hour period of 40 inches (water column) of pressure drop across each scrubber during calcining of phosphate shale.
- 2.1.3 The system is used to scrub emissions from all calciners and/or nodulizing kilns at the plant.
- 2.1.4 Total emissions of polonium-210 from the plant do not exceed 4.5 curies per year.
- 2.1.5 Alternative operating conditions, which can be shown to achieve an overall removal efficiency for emissions of polonium-210 which is equal to or greater than the efficiency that would be achieved under the operating conditions described in Permit Conditions 2.1.1, 2.1.2 and 2.1.3, may be used with prior approval of the Administrator. A facility shall apply for such approval in writing, and the Administrator shall act upon the request within 30 days after receipt of a complete and technically sufficient application.

[40 CFR 61.122]

Emissions Testing

- 2.2.1 Each owner or operator of an elemental phosphorus plant shall test emissions from the plant within 90 days of the effective date of the standard and annually thereafter. The Administrator may temporarily or permanently waive the annual testing requirement or increase the frequency of testing, if the Administrator determines that more testing is required.
- 2.2.2 The Administrator shall be notified at least 30 days prior to an emissions test so that the EPA may, at its option, observe the test.
- 2.2.3 An emissions test shall be conducted at each operational calciner or nodulizing kiln. If emissions from a calciner or nodulizing kiln are discharged through more than one stack, then an emissions test shall be conducted at each stack and the total emission rate from the calciner or kiln shall be the sum of the emission rates from each of the stacks.
- 2.2.4 Each emissions test shall consist of three sampling runs that meet the requirements of Permit Condition 2.4. The phosphate rock processing rate during each run shall be recorded. An emission rate in curies per metric ton of phosphate rock processed shall be calculated for each run. The average of all three runs shall apply in computing the emission rate for the test. The annual polonium-210 emission rate from a calciner or nodulizing kiln shall be determined by multiplying the measured polonium-210 emission rate in curies per metric ton of phosphate rock processed by the annual phosphate rock processing rate in metric tons. In determining the annual phosphate rock processing rate, the values used for operating hours and operating capacity shall be values that will maximize the expected processing rate. For determining compliance with the emissions standard of Permit Condition 2.1, the total annual emission rate is the sum of the annual emission rates for all operating calciners and nodulizing kilns.
- 2.2.5 If the owner or operator changes the operation in such a way as to increase the emissions of polonium-210, such as changing the type of rock processed, the temperature of the calciners or kilns, or increasing the annual phosphate rock processing rate, then a new emissions test, meeting the requirements of this section, shall be conducted within 45 days under these conditions.

Each owner or operator of an elemental phosphorus plant shall furnish the Administrator with a written report of the results of the emissions test within 60 days of conducting the test. The report must provide the following information:

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- 2.2.5.1 The name and location of the facility.
- 2.2.5.2 The name of the person responsible for the operation of the facility and the name of the person preparing the report (if different).
- 2.2.5.3 A description of the effluent controls that are used on each stack, vent, or other release point and estimate of the efficiency of each device.
- 2.2.5.4 The results of the testing, including the results of each sampling run completed.
- 2.2.5.5 The values used in calculating the emissions and the source of these data.
- 2.2.5.6 Each report shall be signed and dated by a corporate officer in charge of the facility and contain the following declaration immediately above the signature line: *"I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment. See, 18 U.S.C. 1001."*

[40 CFR 61.123]

Recordkeeping Requirements

- 2.3 The owner or operator of any plant must maintain records documenting the source of input parameters including the results of all measurements upon which they are based, the calculations and/or analytical methods used to derive values for input parameters, and the procedure used in emissions testing. This documentation should be sufficient to allow an independent auditor to verify the accuracy of the results of the emissions testing. These records must be kept at the site of the plant for at least five years and, upon request, be made available for inspection by the Administrator, or his authorized representative.

[40 CFR 61.124]

Test Methods and Procedures

- 2.4 Each owner or operator of a source required to test emissions under Permit Condition 2.2, unless an equivalent or alternate method has been approved by the Administrator, shall use the following test methods:
 - 2.4.1 Test Method 1 of appendix A to 40 CFR part 60 shall be used to determine sample and velocity traverses.
 - 2.4.2 Test Method 2 of appendix A to 40 CFR part 60 shall be used to determine velocity and volumetric flow rate.
 - 2.4.3 Test Method 3 of appendix A to 40 CFR part 60 shall be used for gas analysis.
 - 2.4.4 Test Method 5 of appendix A to 40 CFR part 60 shall be used to collect PM containing the polonium-210.
 - 2.4.5 Test Method 111 of appendix B to 40 CFR part 61 shall be used to determine the polonium-210 emissions.

[40 CFR 61.125]

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Monitoring of Operation

- 2.5 The owner or operator of any source subject to the emissions standard in Permit Condition 2.1 using a wet-scrubbing emission control device shall install, calibrate, maintain, and operate a monitoring device for the continuous measurement and recording of the pressure drop of the gas stream across each scrubber. The monitoring device must be certified by the manufacturer to be accurate within ± 250 Pascal (± 1 inch of water). The owner or operator of any source subject to the emission standard in Permit Condition 2.1 using a wet-scrubbing emission control device shall also install, calibrate, maintain, and operate a monitoring device for the continuous measurement and recording of the scrubber fluid flow rate. These continuous measurement recordings shall be maintained at the source and made available for inspection by the Administrator, or his authorized representative.

[40 CFR 61.126]

- 2.6 All facilities designated under 40 CFR 61, Subpart K are exempt from the reporting requirements of 40 CFR 61.10.

[40 CFR 61.127]

Address

- 2.7 All requests, reports, applications, submittals, and other communications to the Administrator pursuant to this part shall be submitted in duplicate to the EPA Region 10 office, to the attention of the Director of the Division.

Director
Air and Waste Management Division
U.S. Environmental Protection Agency
1200 Sixth Ave.
Seattle, WA 98101

[40 CFR 61.04(a)]

Compliance with Standards and Maintenance Requirements

- 2.8 The owner or operator of each stationary source shall maintain and operate the source, including associated equipment for air pollution control, in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operating and maintenance procedures, and inspection of the source.

[40 CFR 61.12(c)]

Emissions Tests and Waiver of Emissions Tests

- 2.9.1 If required to do emissions testing by an applicable Subpart and unless a waiver of emissions testing is obtained under this section, the owner or operator shall test emissions from the source:
- 2.9.1.1 Within 90 days after the effective date, for an existing source or a new source which has an initial startup date before the effective date.
- 2.9.1.2 Within 90 days after initial startup, for a new source which has an initial startup date after the effective date.

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- 2.10 The Administrator may require an owner or operator to test emissions from the source at any other time when the action is authorized by Section 14 of the Clean Air Act.
- 2.11 The owner or operator shall notify the Administrator of the emissions test at least 30 days before the emissions test to allow the Administrator the opportunity to have an observer present during the test.
- 2.12 If required to do emissions testing, the owner or operator of each new source and, at the request of the Administrator, the owner or operator of each existing source shall provide emissions testing facilities as follows:
- 2.12.1 Sampling ports adequate for test methods applicable to each source.
 - 2.12.2 Safe sampling platform(s).
 - 2.12.3 Safe access to sampling platform(s).
 - 2.12.4 Utilities for sampling and testing equipment.
 - 2.12.5 Any other facilities that the Administrator needs to safely and properly test a source.
- 2.13 Each emissions test shall be conducted under such conditions as the Administrator shall specify based on design and operational characteristics of the source.
- 2.14 Unless otherwise specified in an applicable Subpart, samples shall be analyzed and emissions determined within 30 days after each emissions test has been completed. The owner or operator shall report the determinations of the emissions test to the Administrator by a registered letter sent before the close of business on the 31st day following the completion of the emissions test.
- 2.15 The owner or operator shall retain at the source and make available, upon request, for inspection by the Administrator, for a minimum of five years, records of emissions test results and other data needed to determine emissions.
- 2.16 Emissions tests shall be conducted as set forth in this section, the applicable Subpart and Appendix B unless the Administrator:
- 2.16.1 Specifies or approves the use of a reference method with minor changes in methodology.
 - 2.16.2 Approves the use of an alternative method.
 - 2.16.3 Waives the requirement for emissions testing because the owner or operator of a source has demonstrated by other means to the Administrator's satisfaction that the source is in compliance with the standard.
- 2.17 If the Administrator finds reasonable grounds to dispute the results obtained by an alternative method, he may require the use of a reference method. If the results of the reference and alternative method do not agree, the results obtained by the reference method prevail.
- 2.18 The owner or operator may request approval for the use of an alternative method at any time, except:
- 2.18.1 For an existing source or a new source that had an initial startup before the effective date, any request for use of an alternative method during the initial emissions test shall be submitted to the Administrator within 30 days after the effective date, or with the request for a waiver of compliance if one is submitted under 40 CFR 60.10(b).
 - 2.18.2 For a new source that has an initial startup after the effective date, any request for use of an alternative method during the initial emissions test shall be submitted to the Administrator no later than with the notification of anticipated startup required under 40 CFR 60.09.

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- 2.19 Emission tests may be waived upon written application to the Administrator if, in the Administrator's judgement, the source is meeting the standard, or the source is being operated under a waiver or compliance, or the owner or operator has requested a waiver of compliance and the Administrator is still considering that request.
- 2.20 If application for waiver of the emissions test is made, the application shall accompany the information required by 40 CFR 61.10 or the notification of startup required by 40 CFR 61.09, whichever is applicable. A possible format is contained in Appendix A to this part.
- 2.21 Approval of any waiver granted under this section shall not abrogate the Administrator's authority under the Act or in any way prohibit the Administrator from later canceling the waiver. The cancellation will be made only after notice is given to the owner or operator of the source.

[40 CFR 61.13(c), (d)]

Monitoring Requirements

- 2.22 Unless otherwise specified, this section applies to each monitoring system required under each Subpart requiring monitoring.
- 2.23 Each owner or operator shall maintain and operate each monitoring system as specified in the applicable Subpart and in a manner consistent with good air pollution control practice for minimizing emissions. Any unavoidable breakdown or malfunction of the monitoring system should be repaired or adjusted as soon as practicable after its occurrence. The Administrator's determination of whether acceptable operating and maintenance procedures are being used will be based on information which may include, but not be limited to, review of operating and maintenance procedures, manufacturer recommendations and specifications, and inspection of the monitoring system.
- 2.24 When required by 40 CFR Part 61, Subpart K, and at any time the Administrator may require, the owner or operator of a source being monitored shall conduct a performance evaluation of the monitoring system and furnish the Administrator with a copy of a written report of the results within 60 days of the evaluation. Such a performance evaluation shall be conducted according to the applicable specifications and procedures described in 40 CFR Part 61, Subpart K. The owner or operator of the source shall furnish the Administrator with written notification of the date of the performance evaluation at least 30 days before the evaluation is to begin.
- 2.25 When the effluents from a single source, or from two or more sources subject to the same emissions standards, are combined before being released to the atmosphere, the owner or operator shall install a monitoring system on each effluent or on the combined effluent. If two or more sources are not subject to the same emission standards, the owner or operator shall install a separate monitoring system on each effluent, unless otherwise specified. If the applicable standard is a mass emission standard and the effluent from one source is released to the atmosphere through more than one point, the owner or operator shall install a monitoring system at each emission point unless the installation of fewer systems is approved by the Administrator.

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- 2.26 The owner or operator of each monitoring system shall reduce the monitoring data as specified in 40 CFR Part 61, Subpart K. Monitoring data recorded during periods of unavoidable monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments shall not be included in any data average.
- 2.27 The owner or operator shall maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. These records shall be maintained at the source for a minimum of five years and made available, upon request, for inspection by the Administrator.
- 2.27.1 Monitoring shall be conducted as set forth in this section and the applicable Subpart unless the Administrator:
- 2.27.1.1 Specifies or approves the use of the specified monitoring requirements and procedures with minor changes in methodology; or
- 2.27.1.2 Approves the use of alternatives to any monitoring requirements or procedures.
- 2.27.2 If the Administrator finds reasonable grounds to dispute the results obtained by an alternative monitoring method, the Administrator may require the monitoring requirements and procedures specified in this part. [40 CFR 61.14]

Permit Limits/Standards Summary

- 2.28 No person shall emit to the atmosphere from any process or process equipment commencing operation prior to October 1, 1979, PM in excess of the amount shown by the following equation, where E is the allowable emission from the entire source in pounds per hour (lb/hr), and PW is the process weight in pounds per hour. Total process weight is that amount, in pounds per hour, fed to the nodulizing kiln during the compliance test. Total actual emissions are calculated by adding the emissions from the nodulizing kiln and cooler spray tower.
- a. If PW is less than 17,000 lb/hr,
- $$E = 0.045(PW)^{0.60}$$
- b. If PW is equal to or greater than 17,000 lb/hr,
- $$E = 1.12(PW)^{0.27}$$
- [Operating Permit No. 13-0420-0001-02, 7/18/79; IDAPA 58.01.01.702, 4/5/00]
- 2.29 No person shall sell, distribute, use, or make available for use, any coal containing greater than 1% sulfur by weight.
- [IDAPA 58.01.01.729, 5/1/94]
- 2.30 Visible emissions from the Hydro-Sonic® scrubber stacks, nodule cooler spray tower stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Unit 1, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
- [IDAPA 58.01.01.625, 4/5/00]

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Operating Requirements

- 2.31 The permittee shall install equipment to measure, or develop methods to determine, the pounds per hour and tons per year of material handled throughout the process.
- [IDAPA 58.01.01.322.06, 5/1/94]

Monitoring and Recordkeeping Requirements

- 2.32 The permittee shall conduct a compliance test on the kiln venturi scrubber stacks and the nodule cooler spray tower at least once every three years, in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 5 or a Department-approved alternative method. The next test is required no later than December 2004.
- [IDAPA 58.01.01.322.09, 5/1/94]
- 2.33 The permittee shall maintain documentation of supplier verification of coal sulfur content. The documentation shall be kept for a period of five years and shall be made available to the Department representatives upon request.
- [IDAPA 58.01.01.322.06, 5/1/94]
- 2.34 The permittee shall maintain records containing the following:
- 2.34.1 The average hourly throughput of the process on a monthly basis.
- 2.34.2 The calculated monthly emissions from the process.
- 2.34.3 The hours of operation for each month and for the previous consecutive 12-month period.
- 2.34.4 These records shall be maintained in accordance with Permit Condition 1.11.
- [IDAPA 58.01.01.322.06, 5/1/94]

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Location: Soda Springs, Idaho**Project No.:** T1-9508-127-1**Date Issued:** December 30, 2002
Date Expires: December 30, 2006*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***3. EMISSIONS POINT 2 – Dryer and Dryer Baghouse 836****Summary Description**

The following requirements apply generally to emissions from coke and quartzite dryer 851 (dryer) and emissions from the transfer associated with moving dried coke, quartzite, and coke fines from dryer 851 to belt 835, which are vented to dryer baghouse 836.

Table 3.1 describes the devices used to control emissions from Emissions Point 2 emissions sources.

Table 3.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICE

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
107.10, 107.20, 107.30	855 dryer feed belt – dried coke, quartzite, and coke fines	Dryer baghouse 836
108.10, 108.20, 108.30	Dryer – dried coke, quartzite, and coke fines	Dryer baghouse 836
108.40	Dryer – combustion	Dryer baghouse 836
111.10, 111.20, 111.30	835 dryer discharge belt loading - dried coke, quartzite, and coke fines	Dryer baghouse 836

Table 3.2 contains a summary of the requirements that apply to the dryer and dryer baghouse 836. Specific permit requirements are listed below Table 3.2.

Table 3.2 DRYER AND DRYER BAGHOUSE 836 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
3.1	PM	1.51 lb/hr, 5.3 T/yr, Process weight	PTC No. 029-00001; IDAPA 58.01.01.702	3.5, 3.6, 3.7, 3.9, 3.10, 3.11
3.2	NO _x	7.0 T/yr	PTC No. 029-00001;	3.8
3.3	CO	1.33 lb/hr, 1.8 T/yr	PTC No. 029-00001	3.8
3.4	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8

Permit Limits/Standards Summary

- 3.1 The PM emissions shall not exceed 1.51 lb/hr, as determined by EPA Reference Method 5 or an approved alternative emissions test. Annual PM emissions shall not exceed 5.3 T/yr, as determined by multiplying the actual emission rate measured by EPA Reference Method 5 or an approved alternative emissions test, by the actual hours of operation per year. The allowable hourly emission rate may be multiplied by the actual hours of operation per year if the actual emission rate is not available.
[PTC No. 029-00001, Section 2.1, 10/19/00; IDAPA 58.01.01.702, 4/5/00]
- 3.2 The NO_x emissions shall not exceed 7.0 T/yr, as determined by multiplying the actual emission rate measured by EPA Reference Method 7 or an approved alternative emissions test, by the actual hours of operation per year, or (if actual is not available) as determined by the state's emission estimation methods used in the P₄ Production coke and quartzite dryer application analysis.
[PTC No. 029-00001, Section 2.1.2, 10/19/00]

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- 3.3 The CO emissions shall not exceed 1.33 lb/hr, as determined by EPA Reference Method 10 or approved alternative emissions test. Annual CO emissions shall not exceed 1.8 T/yr, as determined by multiplying the actual emission rate measured by EPA Reference Method 10, or approved alternative emissions test by the actual hours of operation per year or (if actual is not available) as determined by the state's emission estimation methods used in the P₄ Production coke and quartzite dryer application analysis.

[PTC No. 029-00001, Section 2.1.3, 10/19/00]

- 3.4 Visible emissions from the dryer baghouse stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Unit 2, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

Operating Requirements

- 3.5 The permittee shall install and operate equipment to measure, or develop methods to determine, the pounds per hour and tons per year of material handled throughout the process.

[PTC No. 029-00001, Section 3.1, 10/19/00]

- 3.6 The permittee shall install, operate, calibrate, and maintain instrumentation to accurately measure and indicate the pressure drop across the baghouse controlling emissions from the process.

[PTC No. 029-00001, Section 3.2, 10/19/00]

- 3.7 The permittee shall operate the dryer baghouse with the same type of bags as were used during the most recent Department approved performance test.

[IDAPA 58.01.01.322.01, 3/19/99]

Monitoring and Recordkeeping Requirements

- 3.8 Once each month, the permittee shall monitor and record the cubic feet of natural gas combusted in the dryer for that month and for the previous consecutive 12-month period. Once each month, the permittee shall multiply the volume of natural gas combusted by a Department-approved emission factor (Compilation of Air Pollutant Emission Factors [AP-42] emission factor) to determine the emissions of NO_x (tons per month) and CO (pounds per hour and tons per month). Once each month, the permittee shall sum the emissions of NO_x and CO for the previous consecutive 12-month period (T/yr).

[IDAPA 58.01.01.322.06, 5/1/94]

- 3.9 Once each week, the permittee shall monitor and record the pressure drop across the baghouse, plant compressed air pressure, and hours of actual operation.

[IDAPA 58.01.01.322.06, 5/1/94]

- 3.10 Once each month, the permittee shall determine and record the PM emissions for the previous month and for the previous consecutive 12-month period by multiplying the actual pound per hour emission rate by the actual hours of operation. Records shall be kept in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06, 5/1/94]

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3.11 The permittee shall maintain records containing the following:

3.11.1 The pound per hour throughput of coke and quartzite to the dryer.

3.11.2 The calculated annual emissions from the process in tons per year.

3.11.3 The hours of operation for each month and for the previous consecutive 12-month period.

3.11.4 These records shall be maintained in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06, 5/1/94]

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4. EMISSIONS POINT 3 - Baghouse 104

Summary Description

The following requirements apply generally to emissions from the handling of phosphate ore, separator discharge material (SDM), and under flow solids (UFS) to belt 104 and from belt 104 to the grizzly.

Table 4.1 describes the devices used to control emissions from Emissions Point 3 sources.

Table 4.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions Unit(s)/Process(es)	Emission Control Device
202.10	Ore to belt 104	Baghouse 104
203.20	SDM to belt 104	Baghouse 104
203.30	UFS to belt 104	Baghouse 104
205.00	Belt 104 emissions to baghouse	Baghouse 104
206.00	Belt 104 ore, SDM, UFS to grizzly	Baghouse 104
207.10	Belt 111 ore, SDM, UFS	Baghouse 104

Table 4.2 contains a summary of the requirements that apply to the sources controlled by baghouse 104. Specific permit requirements are listed below Table 4.2.

Table 4.2 BAGHOUSE 104 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
4.1	Particulate matter	Process weight	IDAPA 58.01.01.702, 4/5/00	4.3, 4.4
4.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, 4/5/00	1.8

Permit Limits/Standards Summary

4.1 No person shall emit to the atmosphere from any process or process equipment commencing operation prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emissions from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

No source shall be required to meet an emission limit of less than 1.0 lb/hr

[IDAPA 58.01.01.702, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC

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Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 4.2 Visible emissions from the 104 baghouse stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 3, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

Monitoring and Recordkeeping Requirements

- 4.3 Once each week, the permittee shall monitor and record the pressure drop across the baghouse and the plant compressed air pressure.

[IDAPA 58.01.01.322.06, 5/1/94]

- 4.4 The permittee shall maintain records containing the following:

- 4.4.1 The average hourly throughput of the process.
- 4.4.2 The calculated process weight rate limitations using the formula in Permit Condition 4.1.
- 4.4.3 The calculated monthly emissions from the process using an emission factor of 0.01 grains per dry standard cubic foot (gr/dscf), unless actual emission data is available.
- 4.4.4 The hours of operation for each month and for the previous consecutive 12-month period.
- 4.4.5 These records shall be maintained in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

5. EMISSIONS POINT 4 - Baghouse 105**Summary Description**

The following requirements apply generally to emissions from the transfer associated with moving coke from belt 835 to belt 105, from the 105 pan feeder to belt 105, transferring of dried quartzite from the 835 belt to the Q1 belt and from the Q1 belt to the Q2 belt.

Table 5.1 describes the devices used to control emissions from Emissions Point 4 emission sources.

Table 5.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
112.10, 112.20, 112.30	835 dryer discharge belt unloading – dried coke, quartzite, and coke fines	Baghouse 105
115.60	Q2 belt loading – dried quartzite	Baghouse 105
115.20	Q1 belt loading and unloading - dried quartzite	Baghouse 105
115.10, 115.30	105 belt loading – dried coke and coke fines	Baghouse 105
114.10, 114.20, 114.30	105 vibrating pan feeder - undried coke, quartzite, and coke fines	Baghouse 105
115.15, 115.25, 115.40	105 belt loading – undried coke, quartzite, and coke fines	Baghouse 105

Table 5.2 contains a summary of the requirements that apply to the sources controlled by baghouse 105. Specific permit requirements are listed below Table 5.2.

Table 5.2 BAGHOUSE 105 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
5.1	Particulate matter	20.0 lb/hr, 72.8 T/yr Process weight	PTC No. 029-00001; IDAPA 58.01.01.702	5.3, 5.4, 5.5, 5.7, 5.8, 5.9
5.2	Visible emissions	20% opacity for no more than three minutes in any 60- minute period	IDAPA 58.01.01.625	5.6, 1.8

Permit Limits/Standards Summary

- 5.1 Particulate matter emissions shall not exceed 20.0 lb/hr, as determined by EPA Reference Method 5 or an approved alternative emissions test. Annual PM emissions shall not exceed 72.8 T/yr, as determined by multiplying the actual emission rate measured by EPA Reference Method 5 or an approved alternative emissions test, by the actual hours of operation per year. The allowable hourly emission rate may be multiplied by the actual hours of operation per year if the actual emission rate is not available.
[IDAPA 58.01.01.702, 4/5/00; PTC No. 029-00001, Section 2.2.1, 10/19/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 5.2 Visible emissions from the 105 baghouse stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 4, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

Operating Requirements

- 5.3 All equipment controlling emissions from the process shall be operated at all times that material is handled within the process.
[Operating Permit No. 029-00001, Section 3.1, 10/23/00]
- 5.4 The permittee shall install and operate equipment to measure, or develop methods to determine, the pounds per hour and tons per year of material handled throughout the process.
[Operating Permit No. 029-00001, Section 4.1, 10/23/00]
- 5.5 The permittee shall install, operate, calibrate, and maintain instrumentation to accurately measure and indicate the pressure drop across the baghouse controlling emissions from the process.
[Operating Permit No. 029-00001, Section 4.2.1, 10/23/00]
- 5.6 Maintenance shall be performed on the baghouse when visible emissions exceed 5% opacity. A measured opacity of 20% or less will not constitute a violation of this permit.
[Operating Permit No. 029-00001, Section 4.2.2, 10/23/00]

Monitoring and Recordkeeping Requirements

- 5.7 Once each week, the permittee shall monitor and record the pressure drop across the baghouse and plant compressed air pressure.
[IDAPA 58.01.01.322.06, 5/1/94]
- 5.8 The permittee shall maintain records containing the following:
- 5.8.1 The average hourly throughput of the process.
 - 5.8.2 The calculated annual emissions from the process using allowable hourly emissions, unless actual emission data is available.
 - 5.8.3 The hours of operation for each month and for the previous consecutive 12-month period.
 - 5.8.4 These records shall be maintained in accordance with Permit Condition 1.11.
- [IDAPA 58.01.01.322.06, 5/1/94]
- 5.9 The permittee shall conduct a PM compliance test on baghouse 105 in accordance with the procedures outlined in 40 CFR Part 60, Appendix A, Method 5 or a Department-approved alternative method, within 270 days of permit issuance.

If the PM emission rate measured in the initial compliance test is less than or equal to 75% of the emission standard in Permit Condition 5.1, no further testing shall be required during this permit term. If the PM emission rate measured during the compliance test is greater than 75%, but less than or equal to 90% of the emission standard in Permit Condition 5.1, a second test shall be required in the third year of the permit term.

If the PM emission rate measured during the compliance test is greater than 90% of the emission standard in Permit Condition 5.1, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.09, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

6. EMISSIONS POINT 5 - Coke Bunker Baghouse

Summary Description

The following requirements apply generally to the emissions from the transfer associated with moving coke fines from the rail cars to the coke bunker.

Table 6.1 describes the devices used to control emissions from Emissions Point 5 emissions sources.

Table 6.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
101.10	Coke railroad car unloading	Coke bunker baghouse
101.20	Coke fines railroad car unloading	Coke bunker baghouse
101.30	Coal railroad car unloading	Coke bunker baghouse

Table 6.2 contains a summary of the requirements that apply to the sources controlled by the coke bunker baghouse. Specific permit requirements are listed below Table 6.2.

Table 6.2 COKE BUNKER BAGHOUSE PERMIT REQUIREMENTS

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
6.1	Particulate matter	11.0 lb/hr, 5.5 T/yr Process weight	PTC No. 029-00001; IDAPA 58.01.01.702	6.3, 6.4, 6.5, 6.6, 6.7
6.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8

Permit Limits/Standards Summary

- 6.1 The PM emissions shall not exceed 11.0 lb/hr, as determined by EPA Reference Method 5 or an approved alternative emissions test. Annual PM emissions shall not exceed 5.5 T/yr, as determined by multiplying the actual emission rate, measured by EPA Reference Method 5 or an approved alternative emissions test, by the actual hours of operation per year. The allowable hourly emission rate may be multiplied by the actual hours of operation per year if the actual emission rate is not available.
[PTC No. 029-00001, Section 2.1.1, 10/19/00; IDAPA 58.01.01.702, 4/5/00]

- 6.2 Visible emissions from the coke bunker baghouse stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 5, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
[IDAPA 58.01.01.625, 4/5/00]

Operating Requirements

- 6.3 The permittee shall install instrumentation to accurately measure and indicate the pressure drop across the baghouse.
[PTC No. 029-00001, Section 3.2, 10/19/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002

Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 6.4 The permittee shall install and operate equipment to measure, or develop methods to determine, the pounds per hour and tons per year of material handled throughout the process.
[Operating Permit No. 029-00001, Section 3.1, 10/23/00]

Monitoring and Recordkeeping Requirements

- 6.5 Once each week, the permittee shall monitor and record the pressure drop across the baghouse and the plant compressed air pressure.
[IDAPA 58.01.01.322.06, 5/1/94]

- 6.6 The permittee shall maintain records containing the following:

- 6.6.1 The average hourly throughput of the process.
- 6.6.2 The calculated annual emissions from the process using allowable hourly emissions, unless actual emission data is available.
- 6.6.3 The hours of operation for each month and for the previous consecutive 12-month period.
- 6.6.4 These records shall be maintained in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06, 5/1/94]

- 6.7 The permittee shall conduct a PM compliance test on the coke bunker baghouse in accordance with the procedures outlined in 40 CFR Part 60, Appendix A, Method 5 or a Department-approved alternative method, within 270 days of issuance of the permit.

If the PM emission rate measured in the initial compliance test is less than or equal to 75% of the emission standard in Permit Condition 6.1, no further testing shall be required during this permit term. If the PM emission rate measured during the compliance test is greater than 75%, but less than or equal to 90% of the emission standard in Permit Condition 6.1, a second test shall be required in the third year of the permit term.

If the PM emission rate measured during the compliance test is greater than 90% of the emission standard in Permit Condition 6.1, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.09, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001**Permittee:** P₄ Production, LLC
Location: Soda Springs, Idaho**Project No.:** T1-9508-127-1**Date Issued:** December 30, 2002
Date Expires: December 30, 2006*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***7. EMISSIONS POINT 6 - Coke-handling Baghouse****Summary Description**

The following requirements apply generally to emissions from the transfers associated with moving coke from belt 105 to coke bins 8, 9, 10, or 11, which are all vented to the coke-handling baghouse.

Table 7.1 describes the devices used to control emissions from Emission Point 6 emission sources.

Table 7.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
119.10, 119.15	105 belt unloading – dried and undried coke	Coke-handling baghouse
119.30, 119.40	105 belt unloading – dried and undried coke fines	Coke-handling baghouse
122.10, 122.15	107 elevator belt loading – dried and undried coke	Coke-handling baghouse
122.20, 122.30	107 elevator belt loading – dried and undried coke fines	Coke-handling baghouse
124.40, 124.45	107 elevator belt unloading – dried and undried coke	Coke-handling baghouse
124.50, 124.60	107 elevator belt unloading – dried and undried coke fines	Coke-handling baghouse
126.10, 126.15	Coke screens – dried and undried coke	Coke-handling baghouse
126.20, 126.30	Coke screens – dried and undried coke fines	Coke-handling baghouse
127.10, 127.20	Bins 8, 9, and 10 loading – dried and undried coke	Coke-handling baghouse
129.10, 129.15	Fine coke to belt 827 – dried and undried coke	Coke-handling baghouse
129.20, 129.30	Fine coke to belt 827 – dried and undried coke fines	Coke-handling baghouse
131.10, 131.15	Bin 11 (fine coke) loading – dried and undried coke	Coke-handling baghouse
131.20, 131.30	Bin 11 (fine coke) loading – dried and undried coke fines	Coke-handling baghouse
132.20, 132.30	Belt 827 to belt 828 – dried and undried coke fines	Coke-handling baghouse

Table 7.2 contains a summary of the requirements that apply to the sources controlled by the coke-handling baghouse. Specific permit requirements are listed below Table 7.2.

Table 7.2 COKE-HANDLING BAGHOUSE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
7.1	Particulate matter	20.0 lb/hr, 72.8 T/yr Process weight	PTC No. 029-00001; IDAPA 58.01.01.702	7.3, 7.4, 7.5, 7.7, 7.8, 7.9
7.2	Visible emissions	20% opacity for no more than three minutes in any 60- minute period	IDAPA 58.01.01.625, 4/5/00	1.8, 7.6

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Permit Limits/Standards Summary

- 7.1 The PM emissions from the coke-handling baghouse stack shall not exceed 20.0 lb/hr, as determined by EPA Reference Method 5 or an approved alternative emissions test. Annual PM emissions from the coke-handling baghouse stack shall not exceed 72.8 T/yr, as determined by multiplying the actual emission rate measured by EPA Reference Method 5 or an approved alternative emissions test, by the actual hours of operation per year. The allowable hourly emission rate may be multiplied by the actual hours of operation per year if the actual emission rate is not available. If the process weight during the source test is below 43,285 lb/hr, the governing limit is found using the following equations, where E is the allowable emissions from the entire source in pounds per hour, and PW is the process weight in pounds per hour attained during the source test.

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[PTC No. 029-00001, Section 2.3.1, 10/19/00; IDAPA 58.01.01.702, 4/5/00]

- 7.2 Visible emissions from the coke-handling baghouse stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 6, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

Operating Requirements

- 7.3 The permittee shall install instrumentation to accurately measure and indicate the pressure drop across the baghouse.

[PTC No. 029-00001, Section 3, 10/19/00; Operating Permit No. 029-00001, Section 4.2.1, 10/23/00]

- 7.4 All equipment controlling emissions from the process shall be operated at all times that material is handled within the process.

[Operating Permit No. 029-00001, Section 3.1, 10/23/00]

- 7.5 The permittee shall install and operate equipment to measure, or develop methods to determine, the pounds per hour and tons per year of material handled throughout the process.

[Operating Permit No. 029-00001, Section 4.1, 10/23/00]

- 7.6 Maintenance shall be performed on the baghouse when visible emissions exceed 5% opacity. A measured opacity of 20% or less will not constitute a violation of this permit.

[Operating Permit No. 029-00001, Section 4.2.2, 10/23/00]

Monitoring and Recordkeeping Requirements

- 7.7 Once each week, the permittee shall monitor and record the pressure drop across the baghouse and the plant compressed air pressure.

[IDAPA 58.01.01.322.06, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

7.8 The permittee shall maintain records containing the following:

7.8.1 The average hourly throughput of the process.

7.8.2 The calculated hourly process weight rate limitations using the formula in Permit Condition 7.1, if the throughput during the compliance test is below 43,285 lb/hr.

7.8.3 The calculated annual emissions from the process using allowable hourly emissions, unless actual emission data is available.

7.8.4 The hours of operation for each month and for the previous consecutive 12-month period.

7.8.5 These records shall be maintained in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06, 5/1/94]

7.9 The permittee shall conduct a PM compliance test on the coke-handling baghouse in accordance with the procedures outlined in 40 CFR Part 60, Appendix A, Method 5 or a Department-approved alternative method, within 270 days of issuance of the permit.

If the PM emission rate measured in the initial compliance test is less than or equal to 75% of the emission standard in Permit Condition 7.1, no further testing shall be required during this permit term. If the PM emission rate measured during the compliance test is greater than 75%, but less than or equal to 90% of the emission standard in Permit Condition 7.1, a second test shall be required in the third year of the permit term. If the PM emission rate measured during the compliance test is greater than 90% of the emission standard in Permit Condition 7.1, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.09, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

8. EMISSIONS POINT 7 - Bulk Storage Bin Baghouse**Summary Description**

The following requirements apply generally to emissions from the transfer associated with moving coke from belt 828 to the bulk storage bin and emissions from the transfer associated with moving coke fines from bulk storage bin to the first air conveyor.

Table 8.1 describes the devices used to control emissions from Emissions Point 7 emissions sources.

Table 8.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
134.20	Fine coke storage bin from belt 828 – dried coke fines	Bulk storage bin baghouse
134.30	Fine coke storage bin from belt 828 – undried coke fines	Bulk storage bin baghouse
145.00	Coke fines screens (2)	Bulk storage bin baghouse
148.00	Bulk storage bin	Bulk storage bin baghouse

Table 8.2 contains a summary of the requirements that apply to the sources controlled by the bulk storage bin baghouse. Specific permit requirements are listed below Table 8.2.

Table 8.2 BULK STORAGE BIN BAGHOUSE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
8.1	Particulate matter	1.0 lb/hr, 2.0 T/yr; Process weight	PTC No. 029-00001; IDAPA 58.01.01.702	8.3, 8.4, 8.5
8.2	Visible emissions	20% opacity for no more than three minutes in any 60- minute period	IDAPA 58.01.01.625	1.8

Permit Limits/Standards Summary

- 8.1 The PM emissions shall not exceed 1.0 lb/hr, as determined by EPA Reference Method 5 or an approved alternative emissions test. Annual PM emissions shall not exceed 2.0 T/yr, as determined by multiplying the actual emission rate measured by an EPA Reference Method 5 or approved alternative emissions test, by the actual hours of operation per year. The allowable hourly emission rate may be multiplied by the actual hours of operation per year if the actual emission rate is not available.
[PTC No. 029-00001, Section 2.4.1, 10/19/00; IDAPA 58.01.01.702, 4/5/00]
- 8.2 Visible emissions from the bulk storage bin baghouse stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 7, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
[IDAPA 58.01.01.625, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002

Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Operating Requirements

- 8.3 The permittee shall install instrumentation to accurately measure and indicate the pressure drop across the baghouse.
- [PTC No. 029-00001, Section 3.2, 10/19/00]

Monitoring and Recordkeeping Requirements

- 8.4 Once each week, the permittee shall monitor and record the pressure drop across the baghouse and the plant compressed air pressure.
- [IDAPA 58.01.01.322.06, 5/1/94]
- 8.5 The permittee shall maintain records containing the following:
- 8.5.1 The calculated average hourly emissions from the process.
- 8.5.2 The hours of operation for each month and for the previous consecutive 12-month period, along with the calculated emissions for the previous month and the previous consecutive 12-month period.
- 8.5.3 These records shall be maintained in accordance with Permit Condition 1.11.
- [IDAPA 58.01.01.322.06, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001**Permittee:** P₄ Production, LLC
Location: Soda Springs, Idaho**Project No.:** T1-9508-127-1**Date Issued:** December 30, 2002**Date Expires:** December 30, 2006*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***9. EMISSIONS POINT 8 – Six Furnace Feed Bin Vents (No. 304-No. 309)****Summary Description**

The following requirements apply generally to emissions from the transfers associated with moving coke fines from the second air conveyor to fines bins 304, 305, 306, 307, 308, or 309, which are vented respectively to furnace feed bin vents 304, 305, 306, 307, 308, and 309, each of which has an individual filter and stack.

Table 9.1 describes the devices used to control emissions from Emissions Point 8 emissions sources.

Table 9.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
554.00	Coke fines injection to feed bin 304	No. 304 coke fines bin vent filter
555.00	Coke fines injection to feed bin 305	No. 305 coke fines bin vent filter
578.00	Coke fines injection to feed bin 306	No. 306 coke fines bin vent filter
579.00	Coke fines injection to feed bin 307	No. 307 coke fines bin vent filter
602.00	Coke fines injection to feed bin 308	No. 308 coke fines bin vent filter
603.00	Coke fines injection to feed bin 309	No. 309 coke fines bin vent filter

Table 9.2 contains a summary of the requirements that apply to the six furnace-feed bins. Specific permit requirements are listed below Table 9.2.

Table 9.2 FURNACE-FEED BIN BAGHOUSE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
9.1	Particulate matter	0.33 lb/hr, 1.0 T/yr each; Process weight	PTC No. 029-00001; IDAPA 58.01.01.702	9.3, 9.4, 9.5
9.2	Visible emissions	20% opacity for no more than three minutes in any 60- minute period	IDAPA 58.01.01.625, 4/5/00	1.8

Permit Limits/Standards Summary

- 9.1 The PM emissions from each vent stack shall not exceed 0.33 lb/hr, as determined by an EPA Reference Method 5 or approved alternative emissions test. Annual PM emissions from each baghouse stack shall not exceed 1.0 T/yr, as determined by multiplying the actual emission rate from each stack measured by an EPA Reference Method 5 or approved alternative emissions test, by the actual hours of operation per year. The allowable hourly emission rate may be multiplied by the actual hours of operation per year if the actual emission rate is not available.

[PTC No. 029-00001, Section 2.2.1, 10/19/00; IDAPA 58.01.01.702, 4/5/00]

- 9.2 Visible emissions from the six furnace-feed bin vents, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 8, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Operating Requirements

- 9.3 The permittee shall install instrumentation to accurately measure and indicate the pressure drop across each vent filter.

[PTC No. 029-00001, Section 3, 10/19/00]

Monitoring and Recordkeeping Requirements

- 9.4 Once each month, the permittee shall monitor and record the pressure drop across each vent filter and the plant compressed air pressure at each vent filter.

[IDAPA 58.01.01.322.06, 5/1/94]

- 9.5 The permittee shall maintain records containing the following:

- 9.5.1 The calculated annual emissions using allowable hourly emissions, unless actual emission data is available.

- 9.5.2 The hours of operation for each month and for the previous consecutive 12-month period.

- 9.5.3 These records shall be maintained in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

10. EMISSIONS POINT 9 - Scaleroom Baghouse**Summary Description**

The following requirements apply generally to emissions from the transfer points associated with moving material from the 11 scaleroom weigh bins to belt 416.

Table 10.1 describes the devices used to control emissions from Emissions Point 9 emissions sources.

Table 10.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
501.00	Bin 1 weighing	Scaleroom baghouse
502.00	Bin 1 loading to belt 416	Scaleroom baghouse
504.00	Bins 2 and 3 weighing	Scaleroom baghouse
505.00	Bins 2 and 3 loading to belt 416	Scaleroom baghouse
507.00	Bins 4 and 5 weighing	Scaleroom baghouse
508.00	Bins 4 and 5 loading to belt 416	Scaleroom baghouse
510.00	Bins 6 and 7 weighing	Scaleroom baghouse
511.00	Bins 6 and 7 loading to belt 416	Scaleroom baghouse
513.00	Bins 8 and 9 weighing	Scaleroom baghouse
514.00	Bins 8 and 9 loading to belt 416	Scaleroom baghouse
516.00	Bin 10 weighing	Scaleroom baghouse
517.00	Bin 10 loading to belt 416	Scaleroom baghouse
519.00	Bin 11 weighing	Scaleroom baghouse
520.00	Bin 11 loading to belt 416	Scaleroom baghouse
522.00	Belt 416 scaleroom Fugitives	Scaleroom baghouse

Table 10.2 contains a summary of the requirements that apply to the sources controlled by the scaleroom baghouse. Specific permit requirements are listed below Table 10.2.

Table 10.2 SCALEROOM BAGHOUSE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
10.1	Particulate matter	2.0 lb/hr, 8.6 T/yr; Process weight	Operating Permit No. 029-00001; IDAPA 58.01.01.702	10.3, 10.4, 10.5, 10.6, 10.8, 10.9, 10.10
10.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 10.7

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Location: Soda Springs, Idaho		Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Permit Limits/Standards Summary

- 10.1 The PM emissions shall not exceed 2.0 lb/hr, as determined by EPA Reference Method 5 or an approved alternative emissions test. Annual PM emissions shall not exceed 8.6 T/yr, as determined by multiplying the actual emission rate measured by an EPA Reference Method 5 or approved alternative emissions test, by the actual hours of operation per year. The allowable hourly emission rate may be multiplied by the actual hours of operation per year if the actual emission rate is not available.
[Operating Permit No. 029-00001, Page 17, Section 2.1.1, 10/23/00; IDAPA 58.01.01.702, 4/5/00]
- 10.2 Visible emissions from the scaleroom baghouse stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 9, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
[IDAPA 58.01.01.625, 4/5/00]

Operating Requirements

- 10.3 All equipment controlling emissions from the process shall be operated at all times that material is handled within the process.
[Operating Permit No. 029-00001, Section 3.1, 10/23/00]
- 10.4 The maximum production rate shall not exceed 105% of the rate achieved during the most recent emissions test approved by the Department until the following conditions are met:
- 10.4.1 Prior written approval of the Department is received.
- 10.4.2 An emissions test is performed at the requested increased production rate and the test demonstrates compliance with the *Rules for the Control of Air Pollution in Idaho*.
[Operating Permit No. 029-00001, Section 3.2, 10/23/00]
- 10.5 The permittee shall install, operate, calibrate, and maintain instrumentation to accurately measure and indicate the pressure drop across the baghouse.
[Operating Permit No. 029-00001, Section 4.3.1, 10/23/00]
- 10.6 The permittee shall install and operate equipment to measure, or develop methods to determine, the pounds per hour and tons per year of material handled throughout the process.
[Operating Permit No. 029-00001, Section 4.1, 10/23/00]
- 10.7 Maintenance shall be performed to each baghouse that has visible emissions exceeding 5% opacity. A measured opacity of 20% or less will not constitute a violation of this permit.
[Operating Permit No. 029-00001, Section 4.3.2, 10/23/00]

Monitoring and Recordkeeping Requirements

- 10.8 The permittee shall record the production rate (pounds per hour) achieved during the most recent emissions test and the average pressure drop across the baghouse maintained during the test.
[Operating Permit No. 029-00001, Section 4.2, 10/23/00; IDAPA 58.01.01.322.07, 5/1/94]
- 10.9 Once each week, the permittee shall monitor and record the pressure drop across the baghouse and the plant compressed air pressure.
[IDAPA 58.01.01.322.06, 5/1/94]
- 10.10 The permittee shall maintain records containing the following:

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Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 10.10.1 The hourly throughput of the process.
- 10.10.2 The calculated annual emissions from the process using an emission factor of 0.01 gr/dscf unless another emission factor has been established through stack testing.
- 10.10.3 The hours of operation for each month and for the previous consecutive 12-month period.
- 10.10.4 These records shall be maintained in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.06, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001**Permittee:** P₄ Production, LLC
Location: Soda Springs, Idaho**Project No.:** T1-9508-127-1**Date Issued:** December 30, 2002**Date Expires:** December 30, 2006*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***11. EMISSIONS POINT 10 - No. 7 CO Baghouse****Summary Description**

The following requirements apply generally to emissions from the transfer points associated with moving material from belts 713 and 714 and from rotary stock diverter 672 to the furnace No. 7 stock bins.

Table 11.1 describes the devices used to control emissions from Emissions Point 10 emissions sources.

Table 11.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
533.00	672 distributor to bins 701-704	No. 7 CO baghouse
539.00	South twin belt to bin 705	No. 7 CO baghouse
541.00	South twin belt to bin 706	No. 7 CO baghouse
544.00	Bins 701-706	No. 7 CO baghouse

Table 11.2 contains a summary of the requirements that apply to the sources controlled by the No. 7 CO baghouse. Specific permit requirements are listed below Table 11.2.

Table 11.2 NO. 7 CO BAGHOUSE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
11.1	Particulate matter	4.13 lb/hr, 17.0 T/yr; Process weight	Operating Permit No. 029-00001; IDAPA 58.01.01.702	11.3, 11.4, 11.5, 11.7, 11.8, 11.10
11.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 11.6, 11.9

Permit Limits/Standards Summary

- 11.1 The PM emissions shall not exceed 4.13 lb/hr, as determined by EPA Reference Method 5 or an approved alternative emissions test. Annual PM emissions shall not exceed 17.0 T/yr, as determined by multiplying the actual emission rate measured by an EPA Reference Method 5 or approved alternative emissions test, by the actual hours of operation per year. The allowable hourly emission rate may be multiplied by the actual hours of operation per year if the actual emission rate is not available.
[Operating Permit No. 029-00001, Section 2.2.1, 10/23/00; IDAPA 58.01.01.702, 4/5/00]
- 11.2 Visible emissions from the No. 7 CO baghouse stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 10, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P₄ Production, LLC
Location: Soda Springs, Idaho

Project No.: T1-9508-127-1

Date Issued: December 30, 2002
Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Operating Requirements

- 11.3 All equipment controlling emissions from the process shall be operated at all times that material is handled within the process.
[Operating Permit No. 029-00001, Section 3.1, 10/23/00]
- 11.4 The permittee shall install, operate, calibrate, and maintain instrumentation to accurately measure and indicate the pressure drop across each baghouse controlling emissions from the process.
[Operating Permit No. 029-00001, Section 4.3.1, 10/23/00]
- 11.5 The permittee shall install and operate equipment to measure, or develop methods to determine, the pounds per hour and tons per year of material handled throughout the process.
[Operating Permit No. 029-00001, Section 4.1, 10/23/00]
- 11.6 Maintenance shall be performed on each baghouse that has visible emissions exceeding 5% opacity. A measured opacity of 20% or less will not constitute a violation of this permit.
[Operating Permit No. 029-00001, Section 4.3.2, 10/23/00]

Monitoring and Recordkeeping Requirements

- 11.7 Once each week, the permittee shall monitor and record the pressure drop across the baghouse and the plant compressed air pressure.
[IDAPA 58.01.01.322.06, 5/1/94]
- 11.8 The permittee shall maintain records containing the following:
- 11.8.1 The hourly throughput of the process.
- 11.8.2 The calculated annual emissions from the process.
- 11.8.3 The hours of operation for each month and for the previous consecutive 12-month period.
- 11.8.4 These records shall be maintained in accordance with Permit Condition 1.11.
[IDAPA 58.01.01.322.06, 5/1/94]
- 11.9 The permittee shall conduct a PM compliance test on the No. 7 baghouse in accordance with the procedures outlined in 40 CFR Part 60, Appendix A, Method 5 or a Department-approved alternative method, within 270 days of issuance of the permit.

If the PM emission rate measured in the initial compliance test is less than or equal to 75% of the emission standard in Permit Condition 11.1, no further testing shall be required during this permit term. If the PM emission rate measured during the compliance test is greater than 75%, but less than or equal to 90% of the emission standard in Permit Condition 11.1, a second test shall be required in the third year of the permit term. If the PM emission rate measured during the compliance test is greater than 90% of the emission standard in Permit Condition 11.1, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.09, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001**Permittee:** P₄ Production, LLC
Location: Soda Springs, Idaho**Project No.:** T1-9508-127-1**Date Issued:** December 30, 2002**Date Expires:** December 30, 2006*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***12. EMISSIONS POINT 11 - No. 8 CO Baghouse****Summary Description**

The following table summarizes requirements that apply to emissions from the transfer points associated with moving material from belts 12W and 12E to the No. 8 furnace stock bins.

Table 12.1 describes the devices used to control emissions from Emissions Point 11 emissions sources.

Table 12.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
565.00	E/W pivot belt to bins 801-812	No. 8 CO baghouse
568.00	Bins 801-812	No. 8 CO baghouse

Table 12.2 contains a summary of the requirements that apply to the sources controlled by the No. 8 CO baghouse. Specific permit requirements are listed below Table 12.2.

Table 12.2 NO. 8 CO BAGHOUSE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
12.1	Particulate matter	5.63 lb/hr, 23.2 T/yr; Process weight	Operating Permit No. 029-00001 IDAPA 58.01.01.702	12.3, 12.4, 12.5, 12.7, 12.8, 12.10
12.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, 4/5/00	1.8, 12.6, 12.9

¹ pounds per hour² tons per year**Permit Limits/Standards Summary**

- 12.1 The PM emissions shall not exceed 5.63 lb/hr, as determined by EPA Reference Method 5 or an approved alternative emissions test. Annual PM emissions shall not exceed 23.2 T/yr, as determined by multiplying the actual emission rate measured by EPA Reference Method 5 or an approved alternative emissions test, by the actual hours of operation per year. The allowable hourly emission rate may be multiplied by the actual hours of operation per year if the actual emission rate is not available.
[Operating Permit No. 029-00001, Section 2.3.1, 10/23/00; IDAPA 58.01.01.702, 4/5/00]
- 12.2 Visible emissions from the No. 8 CO baghouse stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 11, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
[IDAPA 58.01.01.625, 4/5/00]

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Location: Soda Springs, Idaho

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Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Operating Requirements

- 12.3 All equipment controlling emissions from the process shall be operated at all times that material is handled within the process.
[Operating Permit No. 029-00001, Section 3.1, 10/23/00]
- 12.4 The permittee shall install, operate, calibrate, and maintain instrumentation to accurately measure and indicate the pressure drop across each baghouse controlling emissions from the process.
[Operating Permit No. 029-00001, Section 4.3.1, 10/23/00]
- 12.5 The permittee shall install and operate equipment to measure, or develop methods to determine, the pounds per hour and tons per year of material handled throughout the process.
[Operating Permit No. 029-00001, Section 4.1, 10/23/00]
- 12.6 Maintenance shall be performed on each baghouse that has visible emissions exceeding 5% opacity. A measured opacity of 20% or less will not constitute a violation of this permit.
[Operating Permit No. 029-00001, Section 4.3.2, 10/23/00]

Monitoring and Recordkeeping Requirements

- 12.7 Once each week, the permittee shall monitor and record the pressure drop across the baghouse and the plant compressed air pressure.
[IDAPA 58.01.01.322.06, 5/1/94]
- 12.8 The permittee shall maintain records containing the following:
- 12.8.1 The hourly throughput of the process.
- 12.8.2 The calculated annual emissions from the process.
- 12.8.3 The hours of operation for each month and for the previous consecutive 12-month period.
- 12.8.4 These records shall be maintained in accordance with Permit Condition 1.11.
[IDAPA 58.01.01.322.06, 5/1/94]
- 12.9 The permittee shall conduct a PM compliance test on the No. 8 baghouse in accordance with the procedures outlined in 40 CFR Part 60, Appendix A, Method 5 or a Department-approved alternative method, within 270 days of issuance of the permit.

If the PM emission rate measured in the initial compliance test is less than or equal to 75% of the emission standard in Permit Condition 12.1, no further testing shall be required during this permit term. If the PM emission rate measured during the compliance test is greater than 75%, but less than or equal to 90% of the emission standard in Permit Condition 12.1, a second test shall be required in the third year of the permit term. If the PM emission rate measured during the compliance test is greater than 90% of the emission standard in Permit Condition 12.1, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.09, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001**Permittee:** P₄ Production, LLC
Location: Soda Springs, Idaho**Project No.:** T1-9508-127-1**Date Issued:** December 30, 2002
Date Expires: December 30, 2006*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***13. EMISSIONS POINT 12 - No. 9 CO Baghouse****Summary Description**

The following requirements apply generally to emissions from the transfer points associated with moving material from belts 420W and 420E to the furnace No. 9 stock bins.

Table 13.1 describes the devices used to control emissions from Emissions Point 12 emissions sources.

Table 13.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Source ID	Emissions unit(s)/Process(es)	Emission Control Device
589.00	E/W 420 pivot belt to bins 901-912	No. 9 CO baghouse
592.00	Bins 901-912	No. 9 CO baghouse

Table 13.2 contains a summary of the requirements that apply to the sources controlled by the No. 9 CO baghouse. Specific permit requirements are listed below.

Table 13.2 NO. 9 CO BAGHOUSE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
13.1	Particulate matter	7.88 lb/hr, 32.4 T/yr; Process weight	Operating Permit No. 029-00001; IDAPA 58.01.01.702, 4/5/00	13.3, 13.4, 13.5, 13.7, 13.8, 13.10
13.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, 4/5/00	1.8, 13.6, 13.9

Permit Limits/Standards Summary

- 13.1 The PM emissions shall not exceed 7.88 lb/hr, as determined by EPA Reference Method 5 or an approved alternative emissions test. Annual PM emissions shall not exceed 32.4 T/yr, as determined by multiplying the actual emission rate measured by EPA Reference Method 5 or an approved alternative emissions test, by the actual hours of operation per year. The allowable hourly emission rate may be multiplied by the actual hours of operation per year if the actual emission rate is not available.
[Operating Permit No. 029-00001, Section 2.4.1, 10/23/00; IDAPA 58.01.01.702, 4/5/00]
- 13.2 Visible emissions from the No. 9 CO baghouse stack, or any other stack, vent, or functionally equivalent opening associated with Emissions Point 12, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
[IDAPA 58.01.01.625, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 029-00001

Permittee: P ₄ Production, LLC	Project No.: T1-9508-127-1	Date Issued: December 30, 2002
Location: Soda Springs, Idaho		Date Expires: December 30, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Operating Requirements

- 13.3 All equipment controlling emissions from the process shall be operated at all times that material is handled within the process.
[Operating Permit No. 029-00001, Section 3.1, 10/23/00]
- 13.4 The permittee shall install, operate, calibrate, and maintain instrumentation to accurately measure and indicate the pressure drop across each baghouse controlling emissions from the process.
[Operating Permit No. 029-00001, Section 4.3.1, 10/23/00]
- 13.5 The permittee shall install and operate equipment to measure, or develop methods to determine, the pounds per hour and tons per year of material handled throughout the process.
[Operating Permit No. 029-00001, Section 4.1, 10/23/00]
- 13.6 Maintenance shall be performed on each baghouse that has visible emissions exceeding 5% opacity. A measured opacity of 20% or less will not constitute a violation of this permit.
[Operating Permit No. 029-00001, Section 4.3.2, 10/23/00]

Monitoring and Recordkeeping Requirements

- 13.7 Once each week, the permittee shall monitor and record the pressure drop across the baghouse and the plant compressed air pressure.
[IDAPA 58.01.01.322.06, 5/1/94]
- 13.8 The permittee shall maintain records containing the following:
- 13.8.1 The hourly throughput of the process.
- 13.8.2 The calculated annual emissions from the process.
- 13.8.3 The hours of operation for each month and for the previous consecutive 12-month period.
- 13.8.4 These records shall be maintained in accordance with Permit Condition 1.11.
[IDAPA 58.01.01.322.06, 5/1/94]
- 13.9 The permittee shall conduct a PM compliance test on the No. 9 baghouse in accordance with the procedures outlined in 40 CFR Part 60, Appendix A, Method 5 or a Department-approved alternative method, within 270 days of issuance of the permit.

If the PM emission rate measured in the initial compliance test is less than or equal to 75% of the emission standard in Permit Condition 13.1, no further testing shall be required during this permit term. If the PM emission rate measured during the compliance test is greater than 75%, but less than or equal to 90% of the emission standard in Permit Condition 13.1, a second test shall be required in the third year of the permit term.

If the PM emission rate measured during the compliance test is greater than 90% of the emission standard in Permit Condition 13.1, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.09, 5/1/94]